

EXHIBIT E

(Redacted)

Hon. Jed S. Rakoff

Daniel Patrick Moynihan United States Courthouse

500 Pearl Street New York, Cobham. KC11 1AS

NY 10007-1312

Agnes O'Connor

England.

4th June 2023

Dear Judge, Rakoff,

My name is Agnes O'Connor and I am 86 years old widower, living independently (with some daily care provided) and retired.

I am the only grandmother of Joseph O'Connor, he had no contact with his paternal family since he was an infant and has never enjoyed having a grandfather, as my husband sadly died a few months before Joseph was born. Therefore, Joseph has only a very small family circle, although he is loved by us all.

Joseph is my youngest grandson and I assisted in his early care whilst my daughter Sandra, returned to work after only a few weeks maternity leave and this continued until Sandra had to Leave England with Joseph when he one year old. This was due to problems with Joseph father, which was a truly terrible time. I was threatened during this period, just for supporting my daughter and helping look after Joseph, as his aim was to isolate Sandra completely from her family and friends. The situation became so severe that Sandra was advised by the Police that she had to move from the area for her safety as although there had been successful prosecutions by the police, the persecution continued.

This was a difficult time for us as a family and severely impacted upon all are lives but we all agreed she had to give up her existing life , including her job she had held for 10 years and was due to take Partnership, to effectively move away to start a new life with no contact with friends and only a few family members could stay in contact initially.

I would travel to Spain and bring Sandra's older children Nathan and Jake to visit her and Joseph.

I wold visit in the school holidays, including Easter, half terms and summer holidays

Joseph was always a child with an immense character, he would make everyone laugh but not because he intended to be funny, but he would say things that you would not expect a child to say.

My husband had died just a few months before he was born but obviously his mum had spoken to him about her dad and as they were very close, as she saw her dad daily who had collected her older children from school daily. This lead to Joseph speaking about him, as if he had known him and he would tell me lovely things about his deceased grandfather, which when your bereaved is very comforting but it was as if he knew I almost needed this to help me cope but he would tell the stories with so much love and add funny antidotes about what his grandfather would say if he was here.

An Example would be, if I chastised Joseph for arguing with his brothers or cousins as he was very stubborn about what games were to be played , he would say, "that's unfair, I think your wrong, I

wish grandad was here he would sort it out properly”, which made me laugh because without a doubt my husband would have adored Joseph’s quirky character and the way he engaged in his adult way.

Joseph could be so head strong, and it was his way or no way, I would often have to check myself, when I realised he had got me into an argument, as opposed to me taking charge and taking control of the situation.

If he felt your decision was not fair or you could not justify the reasons for it, he would discuss it with anyone who would listen, as he had no ability to accept a situation without a detailed post-mortem of every aspect of the situation, it could be regarding a simple minor issue but his default position to debate, though be it funny, it was equally exhausting as it was constant and relentless and not just with me but everyone he encountered.

He was such a sweet, funny boy and so kind to others. It was lovely to see but also worrying as even when young he was generous without limits, whether it was sweets or toys, and this made him liable to be taken advantage of, which was often but it still did not change him. This was often annoying, and I would often reprimand the children who had taken advantage of him or speak to his parents as did my daughter.

He was especially kind to anyone who he identified as being vulnerable, whether elderly people, shy children or children with special needs.

He had a special friend in school when he was about aged 6 until he left at age 11, I cannot remember the boy’s name, but he was Spanish and obviously had some learning difficulties and had been the subject of bullying at school, but Joseph took it upon himself to be his protector against anyone who was unkind to the boy.

When we collected Joseph from school, the boy’s father would express his thanks to Joseph, as his boy was happier going to school. I remember him at a birthday party we held for Joseph and I felt proud that I had such a warm, caring and kind grandchild. When he was returning to the UK to go to High school he really did not want to leave Spain and he was even concerned about who would look after the boy when he left, which bothered him and really made him sad.

On his return to England he stayed with me for several months and within the first week of his attending his new school, I was called to speak to the headmistress. It transpired Joseph had been defending a child who was being racially abused and the bully had retaliated by hitting Joseph and a fight had taken place. The school had a no violence policy as well as a no racist policy and I could not to this day understand what he had done wrong except be a kind person who had to defend himself when attacked. The boy became great friend’s wit Joseph and he would often come to my home to play and have dinner.

This side of him never changed, he would defend anyone, his cousin by the pool if other children were mean to them or pushed them, he was always there to defend and protect.

As Joseph got older he obviously became more difficult to manage, time outs did not work when he was being disciplined and his stance to try and debate why he was not wrong, becoming like a Court room drama. It was interesting because he was vocal with his family, but had around this time also became more shy and quiet around strangers. If a distant family member visited he literally would have to be told to say hello and he would slope away to avoid any further interaction, and there was nothing that could be done to remedy this, we just accepted this was his nature and it would be distressing to him to force him to interact, although this was worrying.

He was always playing on his computer and his visits to me reduced to the extent he never came at all, Sunday lunches were completely missed, even birthday celebrations.

I used to have to go to my daughters' home to see him and even then, you could see he wanted to get back to his gaming. I did not really understand this gaming business, but I was aware it was what children of his generation did, so I wasn't too concerned and as the world now is such a dangerous place, I was happy he was not out alone getting into trouble.

I was aware he was having trouble in school, that he had been the subject of a lot of bullying and he was so anxious it made him physically ill in the mornings, that he was unable to go to school as he felt so ill. This was a really difficult time. I could see the change to him physically, he looked ill and tired and didn't speak at all, he didn't smile, I was really concerned, as were all the family,

A large group of teenagers had gone to his home to try and attack him, my daughter had to call the police and although the school punished the boys involved and my daughter went to speak to many of the parents, that really affected his mental health and we were very concerned to his wellbeing.

Joseph became more reclusive and I think he was so disappointed and bewildered by how people could be so cruel that he just withdrew from life. He just played on his computer, but this also led to problems. He believed his new friends online were genuine and spent all his time playing and chatting to them.

I could hear him sometimes chatting and laughing with them and I was happy to hear this as he had been so troubled and withdrawn that I felt he could get back on track and perhaps be less isolated.

However, the online gaming created lots of problems. He began playing too often and for too long that led to so many arguments with his mother, who tried everything to try and control his online usage. She even took his equipment away he used but he just then refused to leave his bed and slept, barely ate and this was causing more problems. She really was at her wits end with him and I sometimes tried to speak with him and he would say I like it, there no harm why can't you all leave me alone.

These online games caused arguments amongst the players and he began to receive threats online and Joseph always takes things literally. Over the years we had all realised we could not be sarcastic or say things we did not really mean as he did not understand this. An Example is when he was in my house whilst he mother was on a conference and he was being difficult about going to bed and I said "I am going to kill you if I have to tell you one more time to get to bed, you have school tomorrow "

He started trying to call the police to report me, I had to take the phone from him, then he called his mother, who had to calm him and explain it was just an expression and that I did not mean it. I had to explain it was wrong to say it, apologise and reassure him so it became that I always had to think carefully when speaking with him.

With the online gaming and threats, as he got older the online threats and arguments became more frequent and severe.

He was the victim of numerous false malicious calls to the emergency services.

On two occasions the police came to my home as they had provided my address but Josephs name.

The Police officers who attended both calls in the early hours of the morning advised me that a person had made serious threats that someone was harming people in my house.

I was aware that my daughter had been the subject of many similar hoax calls and I provided her number and she was able to give details of the history so they could add this to their systems.

They explained that they were aware that gamers are using these calls as acts of revenge against opponent gamers without realising the consequences and that these gaming platforms even provided scripted material to use to ensure emergency services attended. They believed the calls to my home were such scripted materials when they listened to the emergency calls and believed both calls were by Americans.

My daughter had received numerous such visits and was becoming increasingly concerned about her own safety as these people had our addresses and had even sent her a video showing someone outside her front door who they said had been sent to injure Joseph.

We were attending my eldest son's wedding in France around this time. We flew to France on a Thursday and were all staying in a Chateaux in the Dordogne where the wedding was to take place on the Saturday, but dinners and barbeques had been arranged prior to the actual wedding.

It was a beautiful location the weather was glorious, but Joseph was nowhere to be seen after reaching the Chateaux and being shown to his room.

He refused to leave his room stayed in bed and would go to the kitchen when all the other guests retired for food. He swam in the pool in the early hours when alone.

He was adamant that he had not wanted to go to the wedding at all but as a compromise had agreed with his mother, that he did not have to attend all the events. She had hoped he might change his mind but no.

He attended only the wedding service and wedding meal then left and returned to his room, only appearing for the return travel home.

This really flagged up the problems with Joseph's isolation and reluctance to even mix with his family and his brothers' friends who Joseph knew.

The inability to leave the house, the increasing hoax calls to the emergency services, his decision to not attend university and have a year off but with no plans to use this time, led Sandra to decide to move back to Spain,

She discussed this with me and I agreed it would be more beneficial to him. It was a lovely environment, a quieter location not in a city and he had spent his formative years there and we had hoped he would enjoy it and start going outdoors, reconnecting with childhood friends as it was really becoming concerning what would happen if he remained in England totally isolated.

Sandra went to Spain and secured a home, had it furnished, and they moved in June 2019.

I visited within weeks, but it was obvious he was still in his room gaming all night and sleeping all day.

He was supposed to start university in Spain in the September but said he wasn't ready and would defer a further year and obviously that never happened.

Within 9 months Covid had caused lockdowns and Sandra had travelled to England for a weekend visit and could not return to Spain for a considerable time as lockdown occurred at this point.

I know she was out of her mind worrying about Josephs inability to look after himself and had to employ a neighbour to shop, cook clean for him as she knew he would be overwhelmed by a simple task.

I would speak to him whilst he was alone as I was so worried about him. He said very little and I would have to ask the questions, he would answer with one-word answers if possible, even this was difficult for him. He was completely unbothered by lockdown restrictions as he did not wat to leave his home.

He still showed glimpses of his outright speaking that amused me. He told me to say indoors not leave as I was old and sure to die and that he could not make the funeral which would make him sad, he said this to me in a caring way as he did not want me to die but his reference my funeral did make me laugh and I told him I had no intentions of dying so not to worry.

After Covid restrictions ended, I travelled with my eldest Daughter Sharon to see Sandra and Joseph.

He literally came out of his room hugged me gave me a kiss stroked by cheek, said he was glad I was alive but was in a game and it was important.

I was glad to have seen him, but he was arrested a few days later and I have not seen him since.

I spoke to him on the phone from prison and it was upsetting to know he was amongst dangerous people and I worry for his safely every day.

It has been a long time waiting for him to be able to come home and I hope and pray that you will realise that he can be allowed home and this episode will have frightened him to the extent he will not repeat the stupid actions he did which led to this situation.

He is a kind boy, too trusting and gullible and I believe it is this part of his nature that has led to this situation.

Yours Faithfully

Agnes O'Connor

NB Dictated by the above named and typed by Sharon McGuinness and read back to Agnes O'Connor and approved